

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

EPSILON ENERGY USA,
INC.,

Plaintiff,

v.

CHESAPEAKE APPALACHIA, LLC,

Defendant.

Civil Action No. []

FILED
HARRISBURG, PA

APR - 9 2021

PER IBA
DEPUTY CLERK

**MOTION FOR LEAVE TO FILE PORTIONS OF COMPLAINT,
MOTION FOR PRELIMINARY INJUNCTION, MEMORANDUM
IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION,
AND EXHIBIT UNDER SEAL**

Plaintiff Epsilon Energy USA, Inc. (“Epsilon”), by and through its undersigned counsel, respectfully moves this Court for leave to file portions of its Complaint, Motion for Preliminary Injunction, and Memorandum in Support of Motion for Preliminary Injunction (“Memorandum”) against Defendant Chesapeake Appalachia, LLC (“CHK”), along with the Settlement Agreement that is attached as an exhibit to the Complaint and Memorandum, under seal. In support of this motion, Epsilon refers the Court to its Memorandum in Support filed contemporaneously herewith.

WHEREFORE, for the reasons stated in the accompanying Memorandum in Support of Motion for Leave to File Portions of Complaint, Motion for Preliminary

Injunction, Memorandum in Support of Motion for Preliminary Injunction, and Exhibit Under Seal, Epsilon respectfully requests this Court enter an Order granting it leave to file certain portions of its Complaint, Motion for Preliminary Injunction, and Memorandum, as well as the Settlement Agreement (attached as an exhibit to the Complaint and Memorandum), under seal.

Dated: April 9, 2021

Respectfully submitted,

/s/ Gregory J. Krock

Gregory J. Krock

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Counsel for Plaintiff

Epsilon Energy USA, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing
**Motion for Leave to File Portions of Complaint, Motion for Preliminary
Injunction, Memorandum in Support of Motion for Preliminary Injunction,
and Exhibit Under Seal** has been served on served upon the following by mail, this
9th day of April 2021:

Corporate Representative
Chesapeake Appalachia, LLC
c/o The Corporation Company
1833 S. Morgan Road
Oklahoma City, OK 73128

/s/ Gregory J. Krock